

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
LITIGATION

) Civil Action No. 04-10294-DPW
) (Lead Case)

THIS DOCUMENT RELATES TO:
ALL CASES

$$\begin{array}{c}) \\) \\) \\) \\) \\) \\) \\) \end{array}$$

**JOINT MOTION FOR MODIFICATION OF SCHEDULE
RELATING TO LEAD PLAINTIFF'S CLASS CERTIFICATION MOTION**

Pursuant to Rule 6(b)(1), Fed.R.Civ.P., Lead Plaintiff BPI Global Asset Management LLP and defendants Sonus Networks, Inc., Hassan M. Ahmed, and Stephen N. Nill hereby jointly move for an extension of the deadlines established in the Court's July 27, 2006 Scheduling Order. The grounds for the motion are that, despite continuing good faith efforts to complete the class certification discovery on the timetable previously agreed upon in the parties' Joint Scheduling Conference Statement, filed July 6, 2006, additional time is needed to complete such discovery. *See* the Declaration of Solomon B. Cera, filed herewith. As a result, the briefing schedule and hearing date on Lead Plaintiff's Motion for Class Certification should also be adjusted.

On July 6, 2006, the parties filed an agreed proposed schedule for, *inter alia*, the filing of the class certification motion, related discovery, and further briefing. That schedule, and the subsequent Scheduling Order approving it, required the filing of the motion on July 31, 2006, with discovery to be completed by October 2, 2006, opposition papers to be filed by November 1, 2006, and lead plaintiff's reply brief by December 6, 2006. The court set the matter for hearing on January 3, 2007.

Lead Plaintiff's class certification motion was timely filed on July 31, 2006. However, despite good faith efforts to meet the schedule, the parties require additional time to complete the class certification discovery process.¹ The need for additional time has been occasioned by disputes regarding the defendants' class certification discovery requests, and the parties' ongoing meet and confer efforts to resolve those disputes. In addition, the parties concur that any

^{1/} At the same time as the class certification process has been ongoing, and pursuant to the parties' July 6 agreement, merits discovery has been going forward with the production of documents by defendants and certain third parties.

appropriate depositions should be taken only after all document related issues and disputes have been resolved.

Accordingly, the parties jointly request that the Court enter a revised Scheduling Order establishing the following dates relating to the class certification motion:

- Class certification discovery to be completed by November 22, 2006;
- Defendants' opposition to class certification filed by January 5, 2007;
- Lead Plaintiff's reply papers in support of class certification filed by February 7, 2007;
- Hearing date to be set by the Court

The parties respectfully request that the Court enter an order approving the foregoing revised schedule for lead plaintiff's class certification motion.

Dated: September 29, 2006

GOLD BENNETT CERA & SIDENER LLP

By: /s/Solomon B. Cera

Solomon B. Cera
595 Market Street, Suite 2300
San Francisco, California 94105
Telephone: (415) 777-2230

Attorneys for Lead Plaintiff
BPI Global Asset Management LLP

Dated: September 29, 2006

WILMER CUTLER PICKERING HALE
AND DORR LLP

By: /s/James W. Prendergast

James W. Prendergast (BBO #553073)
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000

Attorneys for Defendant
Sonus Networks, Inc.

Dated: September 29, 2006

CHOATE, HALL & STEWART

By: /s/John R. Baraniak, Jr.

John R. Baraniak, Jr. (BBO #552259)
Two International Place
Boston, Massachusetts 02110
Telephone: (617) 248-5000

Attorneys for Defendant
Hassan M. Ahmed

Dated: September 29, 2006

SKADDEN, ARPS, SLATE, MEAGHER
& FLOM LLP

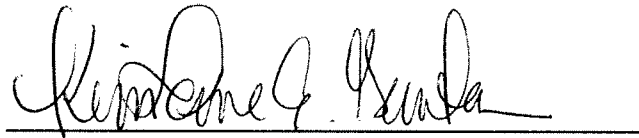
By: /s/Matthew J. Matule

Matthew J. Matule (BBO# 632075)
One Beacon Street
Boston, Massachusetts 02108
Telephone: (617) 573-4800

Attorneys for Defendant
Stephen N. Nill

CERTIFICATE OF SERVICE

I, KimLane E. Gantan, hereby certify that on September 29, 2006, I caused a true and correct copy of the aforementioned **“JOINT MOTION FOR MODIFICATION OF SCHEDULE RELATING TO LEAD PLAINTIFF’S CLASS CERTIFICATION MOTION”** to be served on counsel of record by electronic service pursuant to the Court’s Order Regarding Electronic Service.

A handwritten signature in black ink, appearing to read "KimLane E. Gantan", is written over a horizontal line.

KimLane E. Gantan